

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

EMILY DAVIS,)
)
Plaintiffs,)
)
v.) No. 4:18-CV-01574
)
CITY OF ST. LOUIS, etc., et al.,)
)
Defendants.)

**MOTION OF DEFENDANTS LEYSHOCK, BOYHER, SACHS, JEMERSON,
KARNOWSKI, AND ROSSOMANNO FOR JUDGMENT ON THE PLEADINGS**

Defendants Lt. Col. Gerald Leyshock, Lt. Scott Boyher, Lt. Timothy Sachs, Sgt. Randy Jemerson, Sgt. Matthew Karnowski, and Sgt. Brian Rossomanno, pursuant to F.R.Civ.P. 12(c), move for judgment on the pleadings on counts I, II, III and XII of the second amended complaint herein on the ground that said defendants are entitled to qualified immunity against the claims of conspiracy and unlawful arrest as alleged in said counts.

In lieu of a memorandum in support, defendants submit as an exhibit hereto their memorandum in support of a motion for judgment on the pleadings filed in *Nelson v. City of St. Louis, et al.*, No. 4:19-cv-1561 JCH. This memorandum sets forth the defendants' legal position regarding qualified immunity as to the claims of conspiracy and unlawful arrest alleged in almost identical terms as the claims alleged in the above-captioned cause.

A notice of motion to consolidate is filed concurrently herewith.

Respectfully submitted,

JULIAN L. BUSH
CITY COUNSELOR

Brandon Laird 65564(MO)
Associate City Counselor

/s/Robert H. Dierker 23671(MO)
Associate City Counselor
dierkerr@stlouis-mo.gov
Abby Duncan 67766(MO)
Associate City Counselor
Megan Bruyns 69987(MO)
Assistant City Counselor
Amy Raimondo 71291(MO)
Assistant City Counselor
1200 Market St.
City Hall, Rm 314
St. Louis, MO 63103
314-622-3361
Fax 314-622-4956